

EXHIBIT B

GORDON E. R. TROY, PC

Attorney at Law

Mailing: PO Box 67, Windsor, VT 05089

Office: 183 Highfield Drive, West Windsor, VT 05089

(802)881-0640 | Firm Email: office@webtm.com

November 16, 2022

Charles Knull
Knull P.C.
305 Broadway, 7th Fl.
New York, NY 10007

By Email Only
chk@knullpc.com

Re: 22cv1606 Richtone Design Group, L.L.C. v. Kelly et al

Dear Charles:

On Monday, 11/14, we requested your and Romeo's available times for a meet and confer regarding Plaintiff's RFA responses. As stated in Mag. Krauss's Order (Dkt. #20),

When a party determines it needs either to compel or preclude discovery, the party must, within 3 business days, confer in good faith with the adverse party or parties in person or by telephone to attempt to resolve the dispute. If the dispute is not resolved within 3 business days, the objecting party then has 3 business days to bring the issue to the attention of the Court by filing a letter motion requesting a conference, in accordance with Local Civil Rule 37.2. The letter motion must not exceed 2 double-spaced pages.

We first determined on Monday that we may need to compel Plaintiff to provide answers to the RFAs that comply with the Federal Rules, and thus sent you a request for a meet-and-confer. According to Judge Krauss's Order, the meet-and-confer must take place by close of business tomorrow, 11/17. However, my availability is limited, as I am traveling tomorrow and will only be available sporadically. If you do not wish to meet, please advise. Otherwise, provide us with available times and I will attempt to accommodate.

There is one matter that you may wish to address before we file a letter with Magistrate Krauss: Plaintiff's non-answers to RFA Nos. 56, 57, 58 and 59, where you stated in response to questions regarding RICHTONE001461 through RICHTONE001601, that "the documents referred to are not images." They are indeed images. These are the BATES numbers that you gave to the red-numbered 1992 Deposit Copy and served on us in discovery. The fact that you also marked other documents with the same numbers does not provide grounds for not answering these RFAs. Thus, aside from any other dispute we may have about the sufficiency of Plaintiff's responses, we trust that you will provide answers to these RFAs without delay. Please confirm.



Sincerely,

Gordon

A handwritten signature in blue ink, appearing to read "Gordon E. R. Troy", with a horizontal line underneath.

By: _____

Gordon E. R. Troy, Esq.

Direct Email: gtroy@webtm.com

